

SUE ELLEN WOOLDRIDGE, Assistant Attorney General
JEAN E. WILLIAMS, Section Chief
LISA L. RUSSELL, Assistant Section Chief
KEVIN W. McARDLE, Trial Attorney (D.C. Bar No. 454569)
MICHAEL R. EITEL, Trial Attorney (Neb. Bar No. 22889)
U.S. Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
Ben Franklin Station, P.O. Box 7369
Washington, D.C. 20044-7369
Tel: 202-305-0339 / Fax: 202-305-0275
Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

)	Case No: CV 03-2509-SI
)	
CENTER FOR BIOLOGICAL DIVERSITY, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	JOINT STATUS REPORT, STIPULATION, AND [PROPOSED] ORDER TO EXTEND TIME FOR FILING MOTION FOR FEES AND COSTS
)	
BUREAU OF LAND MANAGEMENT, <i>et</i> <i>al.</i> ,)	
)	
Defendants,)	
)	

Pursuant to the Joint Stipulation to Extend Time for Filing Motion for Fees And Costs filed on October 5, 2006 (Docket No. 194), approved by the Court on October 11, 2006 (Docket No. 195), Plaintiffs and Federal Defendants (“parties”) hereby file a joint status report informing the Court that the parties have not yet been able to reach a settlement resolving Plaintiffs’ claims for fees and costs. Because settlement discussions are ongoing at this time, the parties request additional time to engage

in settlement discussions and attempt to resolve these outstanding claims without the need for judicial intervention. Accordingly, the parties stipulate and respectfully request that the Court extend the deadline for Plaintiffs to file any Motion for Attorney's Fees and Costs until February 13, 2007.

THEREFORE:

IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants, through their respective counsel, that, upon approval of the Court, the deadline for Plaintiffs to file any Motion for Attorney's Fees and Costs is extended until February 13, 2006. If by February 13, 2006, the parties have not reached a settlement resolving Plaintiffs' claims for fees and cost, the parties will file a status report with the Court indicating either that the parties require additional time to reach settlement, or setting forth a briefing schedule for resolving Plaintiffs' claim for fees and costs.

Respectfully submitted this 12th day of December, 2006

SUE ELLEN WOOLDRIDGE
Assistant Attorney General

/s/ Michael R. Eitel
MICHAEL R. EITEL, Trial Attorney
(SBN 22889 (Neb.))
KEVIN W. McARDLE, Trial Attorney
U.S. Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
Ben Franklin Station, P.O. Box 7369
Washington, DC 20044-7369
Tel: (202) 305-0339; Fax: (202) 305-0275
Attorneys for Federal Defendants

/s/ Brendan Cummings (authorized via email)
Brendan R. Cummings (CA Bar. No. 183952)
CENTER FOR BIOLOGICAL DIVERSITY
P.O. Box 549
Joshua Tree, CA 92252
Tel: (760) 366-2232
Fax: (760) 366-2369
bcummings@biologicaldiversity.org

Lisa T. Belenky (CA Bar. No. 203225)
CENTER FOR BIOLOGICAL DIVERSITY
1095 Market Street, Suite 511
San Francisco, CA 94103
Tel: (415) 436-9682 x 307
Lbelenky@biologicaldiversity.org

Pursuant to Stipulation, IT IS SO ORDERED.

DATED: _____



HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE